

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**ZACHARY KNOTTS and LINDSAY
KNOTTS,**

Plaintiffs,

v.

**CITY OF CUYAHOGA FALLS, DYLAN
PARATORE, in his individual and
official capacities, and BRADFORD
DOBNEY in his individual and official
capacities,**

Defendants.

Case No. 5:25-CV-01120-JRA

JUDGE JOHN R. ADAMS

DEFENDANTS' PARTIAL MOTION TO DISMISS PLAINTIFFS' COMPLAINT

Defendants City of Cuyahoga Falls, Dylan Paratore, and Bradford Dobney respectfully move pursuant to Federal Rule of Civil Procedure 12(b)(6) for an order granting dismissal of Plaintiffs' claims brought under the United States and Ohio Constitutions at Counts I, II, III, IV, V, VI, and VII of Plaintiffs' Complaint. These claims fail to state a claim upon which relief can be granted and should be dismissed as a matter of law. The grounds for these Motions are more fully set forth in the accompanying Memorandum of Law in Support, which is incorporated herein by reference.

[Signature on following page]

Respectfully submitted,

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Attorneys for Defendants

City of Cuyahoga Falls, Dylan

Paratore, and Bradford Dobney

CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2025, I filed the foregoing **Defendants' Partial Motion to Plaintiffs' Complaint** with the Clerk using the CM/ECF System, which will send notification of such filing to all counsel of record.

DICKIE, McCAMEY & CHILCOTE, P.C.

By: /s/ Paul J. Schumacher
PAUL J. SCHUMACHER

**Attorneys for Defendants
City of Cuyahoga Falls, Dylan
Paratore, and Bradford Dobney**